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5 **DISTRICT COURT FOR THE UNITED STATES**
6 **DISTRICT OF ARIZONA**

7 Keith Raniere,

8 Plaintiff,

9 v.

10 Merrick Garland, *et. al.*

11 Defendants

Case No.: 4:22-cv-00561-RCC-PSOT

**PLAINTIFF'S MOTION FOR
EXTENSION OF TIME TO
RESPOND TO MOTION FOR
SUMMARY JUDGMENT**

12 Plaintiff, via counsel, requests an extension of 60 days to respond to Defendants'
13 Motion for Summary Judgment at Doc. 36. The current deadline is today, May 31, 2023.
14 The extended deadline will be July 31, 2023. The reason for the extension is that Plaintiff
15 received information indicating that Defendant Warden Gutierrez was open to settlement
16 negotiations. The negotiations were unsuccessful.

17 Additionally, Plaintiff is asking for leave to conduct limited scope discovery
18 regarding the facts asserted in Defendants' Motion. If granted, the discovery will require
19 additional time for gathering and responding to the requests before a response can be
20 filed.

21 Undersigned reached out to opposing counsel for her position on this requests.
22 Ms. Faulk has not responded regarding the extension of time.

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1 DATED this 31st day of May, 2023 by

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3 /s/Stacy Scheff
4 STACY SCHEFF
Attorney for Plaintiff

5 Delivered via ECF
6 to all registered parties
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